#### ALIFORNIA ENERGY COMMISSION

16 NINTH STREET CRAMENTO, CA 95814-5512

### September 11, 2000



Timothy G. Smith Vice President. Power Development Sunlaw Energy Corporation P. O. Box 58324 Los Angeles, CA 90058

Dear Mr. Smith

### **NUEVA AZALEA POWER PLANT PROJECT DATA REQUESTS**

Pursuant to Title 20, California Code of Regulations, section 1716, the California Energy Commission staff requests the information specified in the enclosed data requests. The information requested is necessary to: 1) more fully understand the project, 2) assess whether the facility will be constructed and operated in compliance with applicable regulations, 3) assess whether the project will result in significant environmental impacts, 4) assess whether the facilities will be constructed and operated in a safe, efficient and reliable manner, and 5) assess potential mitigation measures.

This first set of data requests (#1-83) is being made in the areas of air quality, cultural resources, land use, public health, socioeconomics, transmission systems engineering, visual resources, and waste management. Additional data requests in the areas of soil and water resources, noise, traffic, and alternatives will be issued in late September. Written responses to the enclosed data requests are due to the Energy Commission staff on or before October 11, 2000, or at such later date as may be mutually agreed.

If you are unable to provide the information requested, need additional time, or object to providing the requested information, you must send a written notice to both Commissioner Robert Pernell, Presiding Committee Member for the Nueva Azalea Power Plant Project proceeding, and to me, within 15 days of receipt of this notice. The notification must contain the reasons for not providing the information, the need for additional time and the grounds for any objections (see Title 20, California Code of Regulations section 1716 (e)).

If you have any questions, please call me at (916) 653-1245, or E-mail me at ireede@energy.state.ca.us.

Sincerely,

s/James W. Reede, Jr. Energy Facility Siting Project Manager

Enclosure

cc: POS

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**Technical Area: Air Quality** 

Author: Guido Franco

#### **BACKGROUND**

The Application for Certification indicates that the power plant would be built where there is now a truck depot and tractor/trailer parking and maintenance facility. The Applicant also suggests that this will result in a net reduction of air pollutant emissions at the site. For our analysis, we need to estimate the net changes in emissions at the site and their potential impacts on ambient air quality.

#### **DATA REQUEST**

- 1. Please provide information regarding the number of vehicles by vehicle type and its associated hourly and daily emissions for NO<sub>x</sub>, NO, NO<sub>2</sub>, VOC, PM10, and SO<sub>x</sub>. Please use as much as possible California-specific data obtained from the South Coast Air Quality Management District (SCAQMD) or the Air Resources Board (ARB). If California-specific data are not available, please consult U.S. Environmental Protection Agency (EPA) documents known as AP-42. Please also provide information on the approximate location of these emissions inside the truck depot and parking facility
- 2. Please provide an air dispersion modeling analysis of the impacts due to those emissions. Include the impacts for NO<sub>2</sub>, PM10, and SO<sub>2</sub>.

#### **BACKGROUND**

On page 1-6 the applicant indicates that  $SO_x$  emissions will be reduced to undetectable levels. However, SCAQMD permit conditions require the use of quantifiable emission limits.

#### **DATA REQUEST**

3. Please indicate what permitted SO<sub>x</sub> emission levels would be acceptable. Please present this data in parts per million (ppm) corrected to 15% oxygen and in hourly, daily, and annual mass emission limits. Please make sure that the ppm and the mass limits are in agreement with the maximum hourly, daily, and annual heat inputs requested for this project and the input data used in the air dispersion modeling analysis.

#### **BACKGROUND**

CEC Staff needs to verify the adequacy of the air dispersion modeling analysis. The data provided by the Applicant is not clearly documented and it is difficult to reproduce the analysis.

#### **DATA REQUEST**

- 4. Please provide a documentation of the CD submitted with the application containing the air dispersion modeling files. This documentation should be short and should provide only the information needed to identify the files and to allow the identification of the case being modeled. For example, a file named PM10-24-MAX-ref-cooling-tower.lst could be documented as having the input files for the ISC3 model estimating the maximum 24-hour average impacts from the cooling towers using the refined receptors that were shown graphically in Figure x.yy.
- 5. Please provide an electronic copy of all the meteorological files used in the air dispersion modeling analysis and for the creation of the wind roses included in the AFC.
- 6. Please provide a copy of the cooling tower modeling analysis.
- 7. Please confirm that the elliptical cylinders containing the stacks were included in the modeling analysis as buildings surrounding the stacks. Please make sure that the data is included in the CD and was properly documented as requested in data request 4.
- 8. The input data for the SACTI model contains information on the distribution of droplets from the cooling tower (drift) by size (Please see AFC Appendix S. Drift data from Hamon cooling tower). Please confirm that the information is correct and document that this is the expected size distribution by providing size distribution data from manufacturers of mist eliminators that can warranty a drift rate of 0.0006%, if this is the permitted level sought by the Applicant.
- 9. Please confirm that the use of only 1981 as the modeling year is acceptable to SCAQMD (see AFC page 5-17).
- 10. Please explain in more detail how the worst case impacts were estimated for the 8 and 24 hours averaging periods (see AFC page 5-16). For example, the 24-hr worst case impacts included a hot start-up for 2 hours and operation at 50 percent load after that. How was this done? When did the Applicant assume that the 2 hour start-up sequence started? Did the Applicant use the worst 2 hours start-up impacts and then add the worst 22 hours of impacts at 50 percent load? Please indicate what file contains this modeling analysis.

#### **BACKGROUND**

The AFC indicates that the concentration in the stack will be nominally at or below measured ambient air quality levels (see AFC page 1-15). Energy Commission staff needs to understand the conditions under which this assertion is correct.

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#### **DATA REQUEST**

11. Please compare the proposed stack concentrations with not only with the data collected during the six-day ambient air-monitoring program but also with the ambient concentrations from near-by ambient air quality stations operated by SCAQMD. Please make this comparison on a pollutant by pollutant basis using a statistical distribution of ambient concentrations, as much as possible

#### **BACKGROUND**

Staff needs complete information on the sources of offsets that would be used to offset the emissions generated from the proposed project. This information is needed to ensure proper mitigation, as needed. The AFC provides only a cursory description of the potential source of  $NO_x$  offsets (see AFC page 1-16). For our analysis, CEC Staff also needs any technical information that was used to estimate proper offset ratios.

#### **DATA REQUEST**

- 12. Please expand the discussion presented on AFC pages 1-16 regarding the use of Reclaim Trading Credits (RTCs) from the gas turbine electricity plants under Sunlaw Energy Partners I L.P. control. Please include information on the amounts of RTCs owned by these partners for the next 20 years. Please clarify the statement indicating that "these modifications will be in place before the Nueva Azalea facility is commissioned." Does it mean that they will be in place before or soon after SCAQMD submits its Final Determination of Compliance or just prior to the issuance of the license, if granted? Please provide information regarding the location of these facilities and their historical emission levels. Please provide the location information using street addresses and, if possible, their UTM coordinates.
- 13. Please document the assertion (see AFC page 1-16) that three pounds of VOC would eventually form one pound of PM10. Please use as much as possible South Coast air basin specific information.

#### **BACKGROUND**

Energy Commission staff needs a clear documentation of the parameters that would be used to develop the operating permit envelope for this project. For example, Energy Commission staff needs information on the maximum amount of fuel that would be burned because this limits the amount of PM10 emissions. We also need correct information on emissions to make sure that the analysis considers all sources of emissions and its potential impacts

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#### **DATA REQUEST**

- 14. Please provide a summary table containing the following information: 1) maximum hourly, daily, and annual fuel consumption data for the gas turbine, heat recovery steam generator and other ancillary equipment, such as emergency generators and fire pumps. Please provide the same information on a facility-wide basis. Please make sure that the summary table is compatible with the data used in the AFC including the air dispersion modeling analysis.
- 15. Please provide a table summarizing the maximum hourly, daily, and annual emissions from the sources listed in Data Request #14 for NO<sub>x</sub>, SO<sub>x</sub>, VOC, and PM10. Provide the same information also on a facility-wide basis and make sure that the data is in agreement with maximum heat input data and the information provided in the application including the air dispersion modeling analysis.
- 16. On page 3-9 the AFC indicates that the SO<sub>2</sub> removed by the SCONOx<sup>TM</sup> would be used in the cooling tower for pH control. Please discuss the potential implication of an increase of total dissolved solids (TDS) in the cooling water or as a potential source of SO<sub>2</sub> emissions from the cooling tower.
- 17. Please review the drift data in AFC Table 3.4-3. This data seems to be incompatible with a drift rate of 0.0006%. Please provide revised data if appropriate.
- 18. Please confirm that the maximum permitted TDS levels in the cooling tower would be equal to 3,800 mg/l as indicated in AFC Table 3.4-4. This number would be used to estimate potential PM10 emissions.
- 19. Please indicate if you are willing to accept a permit condition limiting the amount of sulfur in the fuel to 0.2 grains of sulfur per 100 standard cubic foot (scf) (see AFC page 5-10). Please note that providers of natural gas usually warranty levels not to exceed 1 grain/100 scf.
- 20. The AFC indicates that NO<sub>2</sub> represents about 10 percent of the NO<sub>x</sub> emissions from combustion sources (see AFC page 5-18). The Applicant further indicates that they used the Ozone Limiting Method (OLM) to estimate hourly NO<sub>2</sub> impacts. The OLM method assumes that 10 percent of NO<sub>x</sub> is emitted as NO<sub>2</sub> but it can be easily modified to account for higher NO<sub>2</sub> fractional levels. Since Dry Low NO<sub>x</sub> Combustors, as the one being proposed for this project, seem to emit 40 percent of NO<sub>x</sub> as NO<sub>2</sub>, please confirm that the 40% fraction was used with OLM. If this is not the case, please revise your analysis and provide revised impact levels. Please also include, if applicable, the input and output files needed to duplicate the analysis.
- 21. Please confirm that the emergency diesel generator described in AFC Appendix Q was included in the modeling analysis. Please explain how this was done.

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- 22. Please provide in electronic form all the input data used for the SACTI model. Please include a copy of the version of the model used in your analysis including an executable file for a Windows95/98<sup>TM</sup> based personal computer.
- 23. AFC Table 5.2-31 included in the replacement page 5-56a indicates that the drift factor is 0.001% and that 31.1% of TDS is converted to PM10. Please indicate if the corrected drift factor is 0.001% or 0.0006%. Please document the assertion that 31.1% of the TDS would be emitted as PM10.

#### **BACKGROUND**

The modeled construction impacts presented in AFC Table 5.2-26 suggest that the  $NO_2$ ,  $SO_2$ , and PM10 impacts would be extremely high producing violations of the ambient air quality standards. It is well known that there are problems associated with trying to estimate realistic fugitive dust impacts (for example, see "Reconciling Urban Fugitive Dust Emissions Inventory and Ambient Source Contribution Estimates: Summary of Current Knowledge and Recent Research", November 1999 by John G. Watson and Judith Chow, Desert Research Institute). At the same time, Energy Commission staff needs to inform the public of realistic expected levels of impacts due to the construction and operation of proposed power plants. Highly overestimated impacts, especially when those estimations are above the ambient air quality standard, are not very informative. They only suggest that a more refined analysis may be warranted.

#### **DATA REQUEST**

24. Please provide a list of considerations that when applied would produce more realistic estimation of construction impacts. Please document these assumptions. The list may cover the following issues: 1) 99% of the NO<sub>x</sub> emissions from gasoline powered engines are emitted as NO; 2) fugitive PM10 emissions from construction operations based on AP-42 may be severely overestimated based on recent emission factors developed by ARB: 3) the ISC3 model is not suitable for estimating emissions at a distance shorter than 100 m from the source; 4) the ISC3 model does not consider the rapid deposition of fugitive dust emissions in vertical surfaces and for this reason may severely overestimate impacts from near ground PM sources; 5) some authors have assumed that the fugitive dust control rules promulgated by SCAQMD will control 70% of the emissions; and 6) fugitive dust emissions are a strong function of wind speed and modeling so not taking into account this fact will severely overestimate impacts. Please document all your assumptions with citation to the technical literature.

#### **BACKGROUND**

The ERCs and RTCs are included in the planning inventories and therefore the potential future emissions from new projects are taken into consideration and it will not impede

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future progress as described in the relevant Air Quality Master Plan. However, to improve the link between the sources of new emissions and the emission reductions, Energy Commission staff asks the Applicants of new projects to make their best effort to obtain the emission reductions in the same general area.

#### **DATA REQUEST**

- 25. Please document the fact that the best effort has been or will be exerted to purchase ERCs located in the general area where the project would be located. This information could be submitted as confidential information, if needed, until the ERC's are formalized.
- 26. Please document efforts to create new ERC's from existing local sources.

#### **BACKGROUND**

New facilities, including power plants, must operate for a short period of time during their initial commissioning of the plant without their air pollution control system to make sure that there is no danger of damaging such system. Also, there is a testing and calibration period for the entire power plant when emissions are usually much higher than the permitted levels under normal operation. Again, there is a need to fully disclose these activities and associated emissions and to develop permit conditions for those activities.

#### **DATA REQUEST**

27. Please provide information regarding the various technical tests during initial commissioning, the duration of each test and expected emission levels during those tests. Please also include hourly, daily, and total maximum emission levels that you would be able to accept as permitted levels during this initial commissioning phase. Please include a fully documented modeling analysis.

#### **BACKGROUND**

The applicant provided very specific data on the anticipated start-up emissions from the combustion turbines. Staff needs to verify these figures as to how they were created, either through a calculation method or from data provided by the turbine vendor.

#### **DATA REQUEST**

28. Please provide either calculations or data from the turbine vendor that substantiates the start-up emissions data shown on AFC page 5-14.

### **BACKGROUND**

The AFC does not describe the demolition activities of the J.B. Hunt Trucking Facility. It is staff's understanding that that demolition activity will be the responsibility of the

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applicant, so therefore information as the scope of that activity and the associated emissions needs to be provided.

#### **DATA REQUEST**

- 29. Please the provide the following information on the demolition of the existing J.B. Hunt truck facility:
  - a. The duration in weeks and/or months of the demolition activity.
  - b. The specific types of activities associated with demolition, including equipment that will be used for each activity and the duration of the use of that equipment for each demolition activity.
  - c. The emissions data associated with each demolition activity described in 29(b) above. This emissions data must be specific to each type of equipment used for each demolition activity.
  - d. The mitigation measures that will be employed to mitigate emissions during each demolition activity.

NOTE: Depending on the information received above, staff may request that a modeling analysis of the potential impacts associated with demolition be done.

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**Technical Area: Cultural Resources Author:** Gary Reinoehl and Dorothy Torres

#### **BACKGROUND**

The applicant requested that the Native American Heritage Commission (NAHC) check their sacred lands file and provide a list of local Native Americans (Replacement AFC page 5-166 and -166a). The applicant provided a sample letter requesting information from Native Americans about cultural resources in the area of the project and a copy of the list of Native Americans obtained from the Native American Heritage Commission. Additional information is needed for staff to complete the analysis.

#### **DATA REQUEST**

- 30. Please provide a copy of the letter from the NAHC regarding their search of the sacred lands file.
- 31. Please provide copies of all letters and enclosures that were sent to the Native Americans.
- 32. Please provide copies of any written responses and summaries of telephone conversations that were received from Native Americans regarding their concerns about the project and knowledge about cultural sites in the vicinity of the project.
- 33. Please describe any additional efforts taken to obtain information from Native Americans.

#### **BACKGROUND**

The applicant indicated that an archeological inventory and an architectural inventory were completed for the project site and the gas pipeline (Replacement Pages 5-166a and –167). In the text of the application, the terms "project site" and "study area" were both used in describing the area that was inventoried. The application also indicated that there are no cultural resources evident on the electrical transmission connection line corridor (Replacement Page 5-168). The exact area inventoried and the methodology for all areas of the inventory are not clear as described. The AFC also states on Replacement Page 5-167 that a substantial adverse change in the significance of a historical resource could be caused by the alteration of the immediate surroundings of an historical resource. The area that was inventoried and the methodology would be described in the archeological inventory reports and the architectural inventory reports. This information is needed for staff to complete the analysis.

#### **DATA REQUEST**

34. Please provide copies of the archeological inventory reports and the architectural inventory reports and all associated maps, enclosures and attachments to those reports for the natural gas pipeline, the project site and the electric transmission

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connection route and a USGS map (1:24,000) with the inventoried areas marked on it.

- 35. Please provide copies of completed DPR 523 forms for the three buildings identified in the project area and a discussion of the significance of the three buildings in the project area under CEQA Section 15064.5, (a), (3), (A)(B)(C) & (D) and provide staff with a copy of the assessment and the specialist's conclusions regarding significance.
- 36. Indicate any historical resources that could have their immediate surroundings altered by this project in such a manner that the significance of the historical resource would be materially impaired and describe any efforts you have taken to identify such properties.
- 37. Please provide the inventory reports that document the presence or absence of historical resources whose immediate surroundings could be impaired by the project and copies of the completed DPR 523 forms.

#### **BACKGROUND**

The AFC (Page 3-38) indicated that a sound wall would be constructed on the west side of the Long Beach Freeway. Additional information is needed for staff to complete the analysis.

#### **DATA REQUEST**

- 38. Please provide inventory reports that document the presence or absence of historical resources that could be impacted by this aspect of the project.
- 39. Please indicate if any permits will be required to construct the sound wall and provide the name, address and telephone number of the agency contact that would be responsible for issuance of the permit except for the Energy Commission's jurisdiction.

#### **BACKGROUND**

The application indicated that there are two waterways near the project area. There was insufficient information to know if the project will require working within the waters of the United States. This information is needed for staff to complete the analysis of potential excavations.

#### **DATA REQUEST**

- 40. Please indicate whether there will be any project activities that will require an Army Corps of Engineers permit.
- 41. If an Army Corps of Engineers permit may be required, please identify the circumstances that will trigger the need for the permit.

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#### **BACKGROUND**

The application provided limited information regarding laydown areas and access roads. Additional information is needed for staff to complete the analysis.

#### **DATA REQUEST**

- 42. Please provide a USGS map (1:24,000) depicting all laydown areas for the project site, the natural gas pipeline, the electric transmission connection route and the sound wall.
- 43. If laydown areas will be needed that are outside of the previously inventoried areas, please provide inventory reports that document the presence or absence of cultural and historical resources that could be impacted by this aspect of the project.

#### **BACKGROUND**

The application indicated that there are no local LORS for cultural resources (Replacement Page 5-171). Staff needs additional information to complete their analysis.

#### **DATA REQUEST**

44. Please identify and describe how you will comply with the County of Los Angeles codes regarding cultural heritage resources and historical buildings.

Technical Area: Land Use

Author: David Flores

#### **BACKGROUND**

City of South Gate Sign Ordinance governs the size, location, and type of signs permitted on the project site. The application materials provide no indication of the signs proposed by the applicant. It is not possible to demonstrate compliance with the City Zoning ordinance from existing data submitted.

#### **DATA REQUEST**

- 45. Provide a sign program that includes the following:
  - a. The location, size and number of all signs proposed.
  - b. The materials that will be used to construct the signs.
  - c. The lighting technique that will be used for the signs.
  - d. The height that signs will be located.
  - e. The type of signs to be used (For example, a monument sign or a building mounted sign).
  - f. If signs will be located on buildings, identify the distance from the surface of the sign to the surface of the structure to which it will be attached.
  - g. An architectural rendering of all signs proposed.
  - h. The content of each sign proposed.

#### **BACKGROUND**

The proposed natural gas line extension will proceed through several different jurisdictions. At least one of these jurisdictions may require a franchise agreement if the proposed pipeline is proprietary but not if the gas pipeline is a part of a regulated utility. We need to know what permits and agreements the applicant will need to obtain.

#### **DATA REQUEST**

46. Indicate if the proposed natural gas pipeline extension will be proprietary or not. If it will be proprietary, please discuss the requirement for franchise agreements and the status of obtaining those agreements.

#### **BACKGROUND**

The South Gate Site Plan Review Process sets forth development standards for density, floor area ratio, building height, coverage, setbacks, usable open space, and

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parking. Any waiver or modification of these requirements would require approval of a variance in accordance with the South Gate Zoning Ordinance. Energy Commission staff needs to know whether the project will meet all other applicable development standards, or if other variances will be required (i.e., stack height, building structure variance). Information needs to be supplied with the Design Review site plan that includes a written tabulation of all development standards.

#### **DATA REQUEST**

47. Please provide a written tabulation of how the project will comply with all development standards as specified in the South Gate Site Plan Review Process.

Technical Area: Public Health Author: Obed Odoemelam

#### **BACKGROUND**

The applicant has acknowledged that the issue of environmental justice should be considered in the analysis of the Nueva Azalea project. The City of South Gate has a minority population of over 80 percent (Nueva 2000a, page 5-201). Staff's preliminary review of the demographic data shows that the vast majority of cities within a six-mile radius (14 of 19) have minority populations of greater than 50 percent. Part of the applicant's argument in support of the proposed site is that their proposed elimination of the diesel-emitting sources in the immediate project area would counteract the impacts of emissions from the proposed facility, thereby improving the air quality in the community of concern with respect to environmental justice.

#### **DATA REQUEST**

- 48. Please provide an analysis to quantitatively demonstrate the public health gains assumed by the applicant with respect to diesel exhausts, other pollutants or air toxics that would be eliminated during operation of the plant. This showing may be made through any acceptable methodology that clearly demonstrates that public exposure will be lower during plant operation.
- 49. Please provide an analysis of the project's indirect effect of relocating the diesel trucks to other cities in the air basin.

#### **BACKGROUND**

The applicant has not provided, in the Public Health section of the AFC, information on the general health status or problems of the surrounding population in the potentially impacted area. This information is required by staff to assess the potential for exacerbation of any existing health problems.

50. Please provide a detailed discussion describing the status and general population health problems in the within 6 miles of the project site. Identify sources or references of information provided.

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### Nueva Azalea Project Data Requests (00-AFC-3)

**Technical Area: Socioeconomics** 

Author: James Adams

#### BACKGROUND

The applicant has acknowledged that the issue of environmental justice should be considered in the analysis of the Nueva Azalea project. The City of South Gate has a minority population of over 80 percent (Nueva 2000a, page 5-201). Staff's preliminary review of the demographic data shows that the vast majority of cities within a six-mile radius (14 of 19) have minority populations greater than 50 percent.

#### **DATA REQUEST**

- 51. Please provide an environmental justice analysis of the project for the proposed site using a six-mile radius as depicted in Figure 5.2-1 (Nueva 2000a). This should include a demographic analysis using the best available census tract data and a discussion of the environmental, economic and health setting.
- 52. Please provide a demographic analysis and description of the general setting and health status for the alternate sites identified in the AFC Supplement.
- 53. Page 1-23 of the Nueva Azalea AFC describes an environmental justice analysis. Please provide the analysis.

#### **BACKGROUND**

Staff requested that the applicant provide additional economic data to show what the income and employment numbers related to the project would be. This information was not supplied in the AFC Supplemental Information-Socioeconomics.

#### **DATA REQUEST**

54. Please provide the IMPLAN income and employment multipliers that were used to calculate the labor months required to construct the project as discussed on Replacement Page 5-204a. Include the type (II or III) of IMPLAN multipliers.

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**Technical Area: Transmission System Engineering** 

Author: Charlie Vartanian, P.E.

#### **BACKGROUND**

In their July 20, 2000 supplemental filing, the applicant identifies:

1-That the Southern California Edison facility study is being performed, 2-The assumed amount of other market generation in Southern California Edison's facility study analysis has been reduced which supports a choice of "congestion management" as a means of mitigation of transmission criteria violations.

3-The applicant's choice of "congestion management" to mitigate any congestion which may be identified as caused by the project.

#### **DATA REQUEST**

- 55. Please provide Southern California Edison's Facility Study for the project. If Southern California Edison's study assumptions have changed from those used for Southern California Edison's System Impact Study for the project, reporting detail must illustrate the project's impact, or lack of impact, upon transmission reliability criteria performance measurements, i.e. thermal overload, voltage deviation, and dynamic stability.
- 56. If Southern California Edison's facility study does not support the applicant's choice of 'congestion management' for all criteria violations identified in the study as project related, please tabulate these differences. If needed, the tabulation should include; the contingencies tested, project related criteria violation(s), and the differing proposals for mitigation.

#### **BACKGROUND**

Mr. Henry M. Ramirez of the California Department of Water Resources (CDWR) submitted a letter (March 28, 2000) to the California Energy Commission in which he expressed concern regarding the potential impact of cumulative short circuit duty from new merchant projects upon CDWR equipment. In the letter, Mr. Ramirez specifically cited concern regarding Nueva Azalea's potential impact to CDWR's Pearblossom Pumping Plant (with connection to Vincent substation). In addition to concern over cumulative short circuit duty impact, Mr. Ramirez requested that the 'Impact Study' address any other impacts to CDWR facilities.

#### **DATA REQUEST**

- 57. Please expand Table 7 of the System Impact Study for Nueva Azalea to include the three phase symmetrical Short Circuit Duty at the high-side of Pearblossom Pumping Plant 230 kV substation, with and without Nueva Azalea. (Substation is titled 'PEARBLSM 230' kV in the GE-PSLF dataset.)
- 58. Please state if impacts to CDWR have been assessed in Southern California Edison's completed transmission studies for the Nueva Azalea project. If so,

please provide information on any impacts to CDWR transmission facilities that your analysis identified. If impacts to CDWR facilities have not been assessed within the Southern California Edison analysis to-date. Please explain at what point in Nueva Azalea's project transmission system impact analysis and review process that impacts to non- Southern California Edison facilities will be analyzed, and findings made available to other non-Edison transmission owners with facilities interconnected to the Southern California Edison system.

**Technical Area: Visual Resources** 

Author: William Kanemoto and Gary Walker

#### **BACKGROUND**

In the AFC and the Supplemental Information, characteristics and locations of certain prominent project features that would strongly influence the project's appearance, particularly fences, soundwalls, and screens, are unclear.

#### **DATA REQUEST**

- 56. Please provide plans and typical architectural elevations of all proposed on- and off-site fencing, screens and soundwalls, including the location, height, colors, materials, patterns and other proposed design characteristics.
- 57. In AFC Figure 5.13-11 (after), the simulation of the project looking northwest from Garfield Avenue, tall perimeter fencing appears to be interrupted by a segment of low fencing in the vicinity of the cooling towers. Please clarify if and why this is the case.

#### **BACKGROUND**

AFC Supplemental Information subsection 5.13.2.2.1 states that members of local communities participated in focus groups to assess project impacts or critical views.

#### **DATA REQUEST**

- 58. Please specify:
  - a. the number of focus groups held;
  - b. how many members of the public participated in each focus group;
  - c. the location of the focus groups; and
  - d. the date of each focus group.
  - e. the questions that the applicant asked at the focus groups
  - f. the findings of the referenced focus groups as they pertain to local attitudes toward the proposed project, critical views, and other issues related to visual sensitivity, particularly including use of recreational sites, schoolyards, or open space within the project viewshed.

#### **BACKGROUND**

In order to communicate the appearance of the proposed project to the public in workshops, etc., large-format simulations are necessary to convey a reasonably accurate sense of visual scale.

#### **DATA REQUEST**

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59. Please provide five sets of photographs and simulations (before and after views) from each KOP, as 11" x 17" format hard-copy prints, at a life-size scale when viewed from a normal reading distance of approximately 18 inches, with two sets of these figures (as well as two of the sets of the simulations requested below in data requests 61, 67, and 68a and b) mounted on display boards.

#### **BACKGROUND**

AFC Supplemental Information 5.13.2.3.1 states that powerplant canopies will be illuminated by decorative uplights. Staff requires additional information to determine the potential effects of direct night lighting and illumination of canopies and plumes as a consequence of proposed uplighting.

#### **DATA REQUEST**

- 60. Please describe the approximate number, type, intensity, and proposed hours of operation of the uplights, including seasonal and special event displays etc.

  Describe any measures proposed to mitigate potential night lighting impacts of these uplights on nearby residents.
- 61. Please provide five sets at 11" x 17" of a color simulation of the proposed project at night with the uplights lit.

### **BACKGROUND**

AFC Supplemental Information subsection 5.13.2.3.1. refers to a public park southeast of the project site. Public open spaces with views of the project would be considered visually sensitive.

#### **DATA REQUEST**

- 62. Please identify by name and location the referenced park and any other public recreation facility or open space, including school playgrounds, within the project viewshed, and locate them on a map that specifies street names and city boundaries.
- 63. Please provide five sets of 11" x 17" high quality color photocopies of a photograph or photographs from the referenced park toward the project site.

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### Nueva Azalea Project Data Requests (00-AFC-3)

- 64. Please provide five sets of 11" x 17" high quality color photocopies of a photograph or photographs of the referenced park illustrating its existing character.
- 65. Please provide five sets of 11" x 17" high quality color photocopies of a photograph or photographs from any other public recreation facility or open space within the project viewshed, including school playgrounds, toward the project.
- 66. Please provide five sets of 11" x 17" high quality photocopies of a photograph or photographs of any other public recreation facilities or open spaces themselves, illustrating the existing character of those settings.
- 67. If the project would be visible from any public recreational viewpoint, please provide five sets at 11" x 17" of a color simulation of the project from each of those views.

#### **BACKGROUND**

AFC Supplemental Information subsection 5.13.2.3.4, which describes the visibility of the exhaust stack plumes, does not provide sufficient data to understand the extent of such plumes or to evaluate their visual effects.

#### **DATA REQUEST**

- 68. Please provide, at a minimum:
  - a. the 10% annual-frequency-of-occurrence height, length, and width for the exhaust stack plumes, as previously provided for the cooling towers, with relevant supporting information.
  - b. A discussion of the water content and relative visual opacity of the exhaust stack plume under median and 10% annual-frequency-of-occurrence conditions. Please compare the water content and opacity of the exhaust plumes to those of the cooling tower.

#### **BACKGROUND**

In order to evaluate potential impacts of project plumes, staff needs to know the extent of existing visible plumes in the viewshed of the proposed project.

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#### **DATA REQUEST**

- 69. Regarding any visible vapor plumes from existing industrial facilities in the viewshed of the proposed project:
  - a. Please show on a map with street names the specific locations of the sources of vapor plumes from existing facilities that are visible from each of the visually sensitive areas identified in the revised Visual Resources section of the AFC.
  - b. Please estimate the number of vapor plumes from existing facilities that are visible from each of the visually sensitive areas identified in the revised Visual Resources section of the AFC.
  - c. Please estimate the size of vapor plumes from existing facilities relative to the calculated size of the vapor plumes for the proposed project. How many would be larger? Similar in size? Smaller?

#### **BACKGROUND**

AFC Supplemental Information subsection 5.13.2.3.2 states that the median plume height is "less than 20m (321 ft)" and that the length is less than 200m (656 ft). While the plume diameter discussion in the Supplemental Information is useful, it does not provide the plume width, which is needed to understand and evaluate the plume's appearance.

#### **DATA REQUEST**

- 70. '321 feet' appears to be a typographical error. Please confirm this. According to Supplemental Information Table 3-2, however, the median height would actually be between 20 and 30 meters, or more than 20m. Please calculate and provide the approximate median height for the cooling tower plume.
- 71. Please provide the median and 10% annual-frequency-of-occurrence cooling tower plume widths. Please also clarify whether plume dimensions refer to the ten cooling tower cells taken together, or individually.
- 72. To depict anticipated plume visibility, please provide five sets at 11" x 17" of color simulations representing the project with median plume conditions of the cooling tower in at least two of the previously provided simulations, selected to illustrate the following viewing conditions:

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### Nueva Azalea Project Data Requests (00-AFC-3)

- a. foreground-distance residential viewpoints (e.g., 5.13-1, -6, -7, or -7a) during daylight;
- b. middleground-distance viewpoints selected to illustrate the overall appearance and magnitude of the anticipated median plumes (e.g., Figures 5.13-9, or –10) during daylight; and
- c. foreground-distance residential viewpoints (e.g., 5.13-1, -6, -7, or -7a) at night, with the decorative uplights lit.

For data requests a and b, If necessary, simulate the background sky color to represent reasonably realistic, foreseeable conditions in order to make simulated plumes in the figures visible.

#### **BACKGROUND**

The AFC Section 3.4.6 states that a 1.2 mile gas pipeline will be constructed.

#### **DATA REQUEST**

- 73. In order for staff to assess impacts from pipeline construction:
  - a. Please explain whether, and if so where, the pipeline construction would require disturbance to curbs, sidewalks, or major vegetation;
  - b. Explain how and when any restoration would be provided.
  - c. Please provide an estimate of the period from beginning to completion of construction.

#### **BACKGROUND**

Staff needs the electronic versions of the applicant's photographs and simulations from each sensitive view area in order to prepare staff's assessment for publication.

#### **DATA REQUEST**

74. Please provide five sets of the electronic versions of the applicant's photographs and simulations from each sensitive view area.

#### **BACKGROUND**

Simulations from various KOPs in the vicinity of the proposed project suggest that it would have the potential to create highly dominant visual intrusion and a dramatic change in the character of views of sensitive receptors in the near foreground vicinity. In

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several instances (e.g., as depicted in AFC Figures 5.13-1 and -3, from Thunderbird Mobile Home Park; 5.13.6, from residences west of Karmont Avenue; and 1.9-2, from immediate freeway foreground) these views would be almost completely unscreened. The most effective means of reducing such visual intrusion would be off-site screening in the vicinity of the receptors themselves.

#### **DATA REQUEST**

75. Please investigate and discuss opportunities for off-site landscape screening such as tree plantings in the vicinity of key sensitive foreground receptors, including the various residential areas near the site and motorists on the Long Beach Freeway. Please describe proposals for such off-site landscape screening, including plan views and depictions. Please describe any proposed on-site landscaping.

**Technical Area: Waste Management** 

**Author**: Mike Ringer

### **BACKGROUND**

AFC p. 1-5 states that the site is located at 5440 and 5532 Southern Avenue. The Phase I Environmental Site Assessment reports that several addresses have been assigned to the site, including 5600, 5620, 5650, and 56501/2 Southern Avenue, with the address of 5650 Southern Avenue being the subject site for the Phase I ESA database list search.

#### **DATA REQUEST**

76. Please clarify the discrepancies in site addresses between the AFC and the Phase I ESA.

#### **BACKGROUND**

The proposed project will use a SCONOx pollution control system, which includes a reformer catalyst, SCONOx catalyst, and SCOSOx catalyst.

### **DATA REQUEST**

- 77. Will the SCONOx catalyst require periodic washing? If so, please describe the generation and management of waste from catalyst washing, including the expected characterization (hazardous, nonhazardous, designated), amount of waste generated, frequency, and method of management (taken off-site, treatment, disposal, etc).
- 78. How often will the SCONOx, SCOSOx, and reformer catalysts have to be replaced? How will they be managed after removal (e.g., sent to hazardous or nonhazardous landfills, recycled/reclaimed, etc.)? If landfilled, what are the expected amounts of each catalyst that would be handled as waste?

#### **BACKGROUND**

A Corrective Action Plan (CAP) that recommends soil vapor extraction has been proposed to remediate soil and groundwater contaminated by gasoline at the proposed site. The plan also recommends additional site characterization investigations to more accurately delineate the extent of soil and groundwater impacts. The regulatory oversight of cleanup operations will be conducted by the Los Angeles Regional Water Quality Control Board (RWQCB).

#### **DATA REQUEST**

- 79. When will the additional site characterization activities be undertaken?
- 80. Has RWQCB staff commented on the CAP or given preliminary approval of the recommended remedial alternative, additional site characterization, and system design? If not, when will the CAP be submitted for their review?

#### **BACKGROUND**

The proposed site is occupied by three buildings, an office trailer, and various above and underground storage tanks. The Phase I Environmental Site Assessment concluded that the potential exists for asbestos-containing building materials and lead-based paint to be present onsite.

#### **DATA REQUEST**

- 81. Please clarify if the estimates on p. 5-294 of the AFC concerning amounts of non-hazardous solid waste generated during construction include wastes from demolition activities. If not, please provide such estimates. Please discuss the potential for recycling of demolition waste.
- 82. Please submit a plan for the assessment of lead-based paint and asbestos containing materials on site. Please submit a plan for the removal and management of such materials if they are found to be present at the site.
- 83. Please indicate what will be done with existing on-site storage tanks and how they will be managed (e.g. recycled as scrap, sold, etc.).